

1 JOSEPH P. RUSSONIELLO (CASBN 44332)  
United States Attorney

2 BRIAN J. STRETCH (CASBN 163973)  
Chief, Criminal Division

4 CHAD M. MANDELL (ILBN 6286783)  
Assistant United States Attorney

5 150 Almaden Boulevard  
6 San Jose, California 95113  
7 Telephone: (408) 535-5059  
Facsimile: (408) 535-5066  
Email: chad.mandell@usdoj.gov

8 Attorneys for the United States of America

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION

13  
14 UNITED STATES OF AMERICA, ) No. CR 07-00612 JF  
15 Plaintiff, ) STIPULATION AND [PROPOSED]  
16 v. ) ORDER EXCLUDING TIME FROM JUNE  
17 ABEL LAMAS-PACHECO, ) 18 TO JUNE 25, 2008 FROM THE  
18 Defendant. ) SPEEDY TRIAL ACT CALCULATION  
19 \_\_\_\_\_ ) (18 U.S.C. § 3161(h)(8)(A))  
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21 The parties stipulate that the time between June 18, 2008 and June 25, 2008 is excluded under  
22 the Speedy Trial Act, 18 U.S.C. §3161, and agree that the failure to grant the requested  
23 continuance would unreasonably deny defense counsel reasonable time necessary for effective  
24 preparation, taking into account the exercise of due diligence. Finally, the parties agree that the  
25 ends of justice served by granting the requested continuance outweigh the best interest of the  
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1 public, and the defendant in a speedy trial and in the prompt disposition of criminal cases.  
2 18 U.S.C. §3161(h)(8)(A).

3  
4 DATED: June 18, 2008

JOSEPH P. RUSSONIELLO  
United States Attorney

5  
6 /s/  
7 CHAD M. MANDELL  
Special Assistant United States Attorney

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9 /s/  
10 LARA VENNARD  
Assistant Federal Public Defender

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## ORDER

Based upon the stipulation of the parties, and for good cause shown, the Court HEREBY ORDERS that the time between June 18, 2008 and June 25, 2008 is excluded under the Speedy Trial Act, 18 U.S.C. §3161. The court finds that the failure to grant the requested continuance would unreasonably deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. Furthermore, the Court finds that the ends of justice served by granting the requested continuance outweigh the best interest of the public and the defendant in a speedy trial and in the prompt disposition of criminal cases. The court therefore concludes that this exclusion of time should be made under 18 U.S.C. §3161(h)(8)(A).

IT IS SO ORDERED.

DATED:

**JEREMY FOGEL  
UNITED STATES DISTRICT JUDGE**